

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

**MICHAEL POSTAWKO, et al.,**

**Plaintiffs,**

**v.**

**MISSOURI DEPARTMENT OF  
CORRECTIONS, et al.,**

**Defendants.**

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**CASE NO. 2:16-CV-04219-NKL**

**CORIZON LLC'S MOTION TO REDACT**

Pursuant to Local Rule 80.1(a)(1), Defendant Corizon, LLC ("Corizon") hereby submits this Motion to Redact the Preliminary Injunction Hearing Transcript. Corizon requests redaction of the following information from the Preliminary Injunction Hearing Transcript:

Volume II: 365:12-366:20; 367:18-23; 370:2-10

Volume III: 605:21-24; 662:7-664:10

(the "Proposed Redactions").

As the Court is aware, Corizon filed a Motion for Protective Order relating to certain documents (the "Protected Documents") protected by the patient safety work product privilege and the Patient Safety and Quality Improvement Act of 2005, 42 U.S.C. § 299b-21. (Doc. No. 353). The Proposed Redactions include testimony and argument specifically referencing and describing the Protected Documents. Plaintiffs opposed the Motion for Protective Order, arguing that the Protected Documents are not protected from disclosure altogether. (Doc. No. 366). Plaintiffs do not, however, dispute that, if Corizon must produce the documents, Corizon may designate them at least as "Confidential" under the Joint Stipulated Protective Order in place in this case. (Doc. No. 168). (See Doc. No. 366 at 8, Plaintiffs arguing that Joint Stipulated Protective Order (Doc.

No. 168) would adequately protect the Protected Documents; Hearing Tr., Vol. III, 879:16-18, Plaintiffs' counsel stating, "[W]e have a protective order in this case; and if the concern is that this information is going to be public, we could treat those records as confidential").

The Joint Stipulated Protective Order provides that "CONFIDENTIAL or ATTORNEYS' EYES ONLY material – including but not limited to transcripts, depositions, affidavits, exhibits, briefs, memoranda, discovery responses, or other documents or pleadings which set forth, summarize or specifically reference CONFIDENTIAL or ATTORNEYS' EYES ONLY material – shall be redacted from any document before filing the document with the Court." (Doc. No. 168, ¶ 15). Accordingly, Corizon respectfully requests that this Court issue an order providing for the redaction of the Proposed Redactions from the Preliminary Injunction Hearing Transcript.

Dated: September 19, 2019

/s/ William R. Lunsford  
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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served upon all attorneys of record in this matter, including without limitation the following, by the Court's CM/ECF system on September 19, 2019:

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